

**MARIAN SNOW,**

**Plaintiff,**

**v.**

**GLOBAL CREDIT AND COLLECTION CORPORATION; and GLOBAL INTERNATIONAL,**

**Defendants.**

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**DEFENDANT GLOBAL CREDIT AND  
COLLECTION CORPORATION’S  
MEMORANDUM IN OPPOSITION TO  
PLAINTIFF’S REQUEST TO CLERK  
FOR ENTRY OF DEFAULT  
JUDGMENT**

As shown in Global's Memorandum of Law in Support of Motion to Set Aside Entry of Default, each of the six factors relevant to a Fed. R. Civ. P. 55(c) motion dictates setting aside the entry of default in this case. Thus, because "good cause" under Rule 55(c) exists for the Court to set aside the entry of default entered against Global on March 28, 2014, Plaintiff's Request for Default Judgment should be denied. As a result, Global respectfully requests that the Court deny Plaintiff's Request for Default Judgment, set aside the entry of default entered against Global on March 28, 2014, and permit Global to answer or otherwise respond to Plaintiff's Complaint within seven (7) days of the Court's Order.

This 22nd day of May, 2014.

Respectfully submitted,

*s/ William J. Long*

William J. Long IV (N.C. Bar No. 34845)

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Attorney for Defendant

GLOBAL CREDIT AND COLLECTION CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document via U.S. First Class Mail, on this the 22nd day of May, 2014:

Marian Snow  
103 Nostalgia Ln  
Zebulon, North Carolina 27597

s/ William J. Long  
OF COUNSEL